

**MEMO ENDORSED**

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By ECF

Hon. Valerie E. Caproni  
United States District Court Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007-1312

Re: *United States v. Gustavo Betancourt*,  
19 Cr. 661 (VEC)

Dear Judge Caproni:

I write on behalf of Gustavo Betancourt to respectfully request that his conditions of pretrial release be modified to permit him to travel to San Antonio, Texas, for purposes of his continued employment with Parkway Paving for approximately one month. (The company, which is based in New Jersey, typically works in other regions during the cold weather months.) This application is made with the consent of Pretrial Services; the government defers to Pretrial's position.

If approved, Mr. Betancourt will drive one of the company's vehicle's along with other members of his work crew to San Antonio, where they will reside in a hotel. He will advise his supervising Pretrial Services Officer of the address of the hotel and the precise dates of travel and will check in as required.

Respectfully yours,



Evan L. Lipton  
*Attorney for Gustavo Betancourt*

cc: Alexandra Messiter  
*Assistant United States Attorney*

Application GRANTED.

SO ORDERED.



1/3/2025

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE